



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 30 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7015 0640 0001 0675 9447

Mr. Ernest Firpo, Owner
Yachtsmen's Cove Inc.
696 South Main Street
Freeport, NY 11520

RE: Request for Information (RFI) Pursuant to Section 308 of the Clean Water Act
Yachtsmen's Cove Inc. (NYR00E462)
Docket No. CWA-IR-16-001

Dear Mr. Firpo:

On July 21, 2015, the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI) at the Yachtsmen's Cove Inc. facility located at or near 696 South Main Street in Freeport, New York (the "Facility"). The purpose of the CEI was to evaluate the Facility's compliance with the New York State Department of Environmental Conservation (NYSDEC) State Pollution Discharge Elimination System (SPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP or "Permit").

The EPA is charged with the protection of human health and the environment under the Clean Water Act (CWA or Act), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

You are hereby required, pursuant to Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to submit to EPA the following information regarding the subject Facility no later than **thirty (30) calendar days** of receipt of this RFI:

1. A formal, written response to the enclosed CEI Report (including photo documentation, where applicable) that describes how the Potential Noncompliance Items and Areas of Concern have been or will be addressed;
2. Any information in regards to the Catch Basin located in the concrete slab below the travel crane, including but not limited to;
 - a. Drywell photographs and design calculations,
 - b. Solids removal and vendor information,

- c. Any information regarding the origin or destination of the unmarked PVC pipe in the catch basin,
 - d. Location of the drywell and manhole allegedly connected to the catch basin,
 - e. Any information regarding the Oil Water Separator,
 - f. Any additional information about the drainage on site.
3. Any information regarding the origin or determination of the unmarked PVC pipe in the bulkhead wall leading into the public bathrooms, including but not limited to;
- a. Any dye testing results and or photographs to indicate that the PVC line does or does not connect into the sink, floor drain, or toilet in the restroom,
 - b. Any design plans that indicate the connection of the bathroom drains to the sanitary sewer,
 - c. Any other additional information in regards to the PVC pipe origin and connection.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by you must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject Yachtsmen’s Cove Inc., to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject Yachtsmen’s Cove Inc. to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the CEI Report detailing EPA's findings from the July 21, 2015 CEI.

If you have any questions regarding this Request for Information or the enclosed CEI Report, please feel free to contact Chris Mecozzi of my staff via phone at (212) 637-4262 or via email at Mecozzi.christopher@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. McKenna', with a long horizontal flourish extending to the right.

Douglas McKenna, Chief
Water Compliance Branch

Enclosures

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC
w/enclosure



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/>
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Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> 68 <input type="checkbox"/> 69 <input type="checkbox"/>	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 76 <input type="checkbox"/> 77 <input type="checkbox"/> 78 <input type="checkbox"/> 79 <input type="checkbox"/> 80 <input type="checkbox"/>	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
Yachtsmen's Cove Inc. 696 South Main Street Freeport, NY 11520	12:30pm 7/21/15	
	Exit Time/Date	Permit Expiration Date
	1:30PM 7/21/15	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Ernie Firpo, Owner Yachtsmen's Cove Inc. 516-546-6026	Lat, Long: 40.638484, -73.574670	
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted	
Ernie Firpo, Owner Yachtsmen's Cove Inc. 516-546-6026	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Chris Mecozzi, Environmental Engineer	EPA/DECA-WCB (212) 637-4262	11/24/15
Mariessa Abburscato, Environmental Scientist	EPA/DECA-WCB (212) 637-4293	11/24/15
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Justine Modigliani P.E., Compliance Section Chief	EPA/DECA-WCB/ (212) 637-4268	11/25/15

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B ---- EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L ---- Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, New York, NY 10007

Compliance Evaluation Inspection: Yachtsmen's Cove	
Inspection Date: July 21, 2015	Inspection Time: 12:30 PM – 1:30 PM
EPA Inspector: Christopher Mecozzi, Environmental Engineer, USEPA Region 2, DECA, Water Compliance Branch, (212) 637-4262	
Also On-Site: Marissa Abbruscato, Life Scientist, USEPA Region 2, DECA, Water Compliance Branch, (212) 637-4293	
Yachtsmen's Cove On-Site Representative: Ernie Firpo, Owner (516) 546-6026	
Site Information: 696 South Main Street, Freeport, NY 11520 SPDES No. NYR00E462 Owner/Operator/Permittee: Ernie Firpo, Owner 696 South Main Street Freeport, NY 11520	

A. INTRODUCTION

On July 21, 2015 the United States Environmental Protection Agency ("EPA") conducted a Compliance Evaluation Inspection ("CEI") at Yachtsmen's Cove Inc., located at 696 South Main Street, Freeport, NY (the "Site" or "Facility") to determine compliance with New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) Multi-Sector General permit (GP-0-12-001) for Stormwater Discharges Associated with Industrial Activity. The Facility maintains coverage under the New York State Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. NYR00E462, and operates under Sector Q (Water Transportation). The weather conditions on site at the time of the CEI were cloudy and 83 degrees with no precipitation.

B. FINDINGS & OBSERVATIONS

Upon entering the site, EPA inspector Christopher Mecozzi presented credentials to Mr. Ernie Firpo, Owner of Yachtsmen's Cove. EPA inspectors evaluated the Stormwater Pollution Prevention Plan ("SWPPP") before conducting a site walk-through. The facility submitted the Notice of Intent ("NOI") on August 24, 2009 and received coverage under Permit No. NYR00E462 on January 2, 2013. The facility has one (1) permitted outfall that connects to a

catch basin in the parking lot and discharges directly to the bulkhead into the Hudson Canal (see photograph DSCN5042).

The facility is a full service marina, with approximately 125 slips available. At the time of the CEI, the marina had roughly 60-65 slips filled. According to Mr. Firpo, the marina performs all general maintenance activities which include, power-washing, bottom painting, oil changes, hydro-blasting, and other boat and engine repairs. The Facility stores all waste oil on-site until a subcontractor, Planet Earth Recovery comes to pick it up. The marina does not provide fueling or pump out services. The marina consists of a gravel parking lot, a full service garage/shop, an office building, an on-site bathroom, docks and two portable hydraulic lifts. The smaller lift is less frequently used is roughly seven (7) tons. The larger more frequently used lift is mobile and is approximately sixty (60) ton (see photograph DSCN5051). EPA inspectors observed a catch basin underneath the larger lift (see photographs DSCN5052-DSCN5053). According to Mr. Firpo, the catch basin is a dry well that collects all materials from power-washing, painting and other maintenance activities that take place on the concrete slab but does not discharge into the bay. The solids are then removed from the basin and the liquid drains to a drywell which is then pumped out as necessary. At the time of the CEI, the EPA inspectors were unable to locate the manhole and were unable to obtain any information regarding the removal of solids from the drywell. EPA personnel noted an unidentified PVC pipe inside the catch basin under the portable lift (DSCN5053). At the time of the inspection, Mr. Firpo did not have any information about where the PVC pipe discharged to. Along the bulkhead adjacent to the lift EPA inspectors observed an unknown PVC pipe (see photographs DSCN5045-DSCN5055).

The facility maintains one bathroom on-site. The bathroom is located approximately 25 feet from the bulkhead of the marina. EPA inspectors observed an unknown pipe in the bulkhead directly in line with the on-site bathroom (see photograph DSCN5045). Inspection of the bathroom/floor drain plumbing indicates a potential illicit connection to the bulkhead (see photographs DSCN5056-DSCN5059).

The following potential noncompliance items and areas of concern were identified at the time of the CEI:

Potential Noncompliance Items

1. As required by Part III.A of the Permit, a Stormwater Pollution Prevention Plan ("SWPPP") shall be developed and implemented by the owner or operator for each facility covered by the Permit. At a minimum, the SWPPP is required to include the items identified in Part III.C and Part VIII (Sector-Specific Requirements – Sector Q) of the Permit. Based on review of the SWPPP available at the time of the CEI, as well as observations made during records review and the Facility walk-through, the Facility failed to develop and/or implement the following SWPPP elements, in violation of Part III.C of the Permit:
 - a. As identified in photograph DSCN5053, EPA inspectors observed an unknown PVC pipe inside the catch basin under the portable lift that collects all debris and wastewater from power-washing and other maintenance activities performed

outside. At the time of the CEI, facility representative Mr. Firpo could not provide information as to where the pipe discharged to. As shown in photographs DSCN5045-DSCN5055, EPA inspectors identified and unknown PVC pipe in the bulkhead adjacent from the lift catch basin. Part III.C.7.f of the Permit requires that the Facility eliminate all non-stormwater discharges not authorized by this general permit or another SPDES permit. Non-stormwater discharges that are not listed in Part I.C.3 to surface waters of the State which are not authorized by a SPDES permit are unlawful and must be terminated.

- b. As shown in photograph DSCN5045, a PVC pipe in the bulkhead of the marina was observed directly adjacent from the on-site bathroom, approximately twenty-five (25) feet away. Further inspection of the bathroom piping/plumbing underneath the structure revealed a potential connection from the bathroom floor drain to the PVC piping located in the bulkhead (photographs DSCN5056-DSCN5059). Part III.C.7.f of the Permit requires that the Facility eliminate all non-stormwater discharges not authorized by this general permit or another SPDES permit. Non-stormwater discharges that are not listed in Part I.C.3 to surface waters of the State which are not authorized by a SPDES permit are unlawful and must be terminated.

Areas of Concern

2. As shown in photograph DSCN5041, 55 gallon drums and paint canisters were not stored on containment pallets inside the maintenance garage. Materials should be stored on secondary containment pallets to minimize the potential for spills and leaks.

C. CLOSING

A closing conference was held with Mr. Firpo explaining EPA findings identified at the time of the CEI and any additional questions were answered at that time.

D. ATTACHMENTS

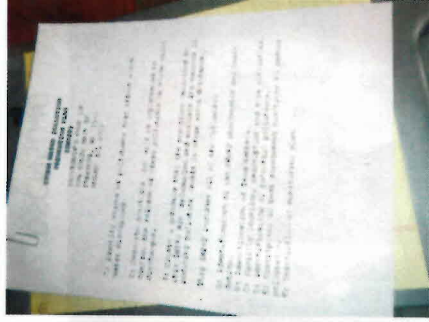
Photographs

Photographic Log (Nikon Coolpix AW100) Freeport, NY –Yachtsmen’s Cove Inc. (Un-edited photos taken by Marissa Abbruscato, Scientist, USEPA Region 2, Water Compliance Branch, July 21, 2015).	
Photo ID	Description
DSCN5033	Sign at front of marina.
DSCN5034	Page 1 of Stormwater Pollution Prevention Plan (SWPPP).
DSCN5035	Page 2 of SWPPP.
DSCN5036	Page 3 of SWPPP.
DSCN5037	Page 4 of SWPPP.
DSCN5038	Page 5 of SWPPP.
DSCN5039	Blurry photo of petroleum storage.
DSCN5040	Petroleum storage area around back of shop.

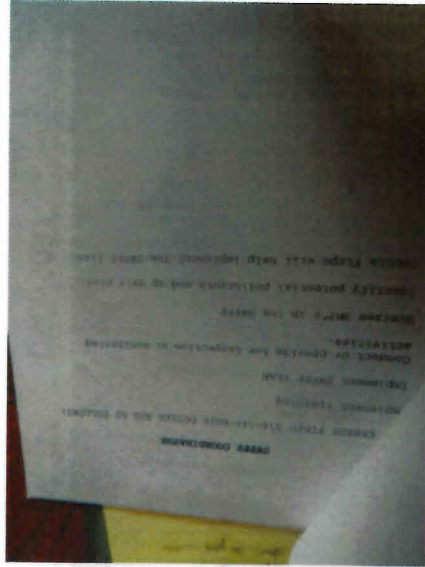
DSCN5041	Waste oil containers, Planet Earth Recovery comes to pick up.
DSCN5042	Permitted discharge drain that leads to bulkhead.
DSCN5043	Patron cleaning engine over open water.
DSCN5044	Fish cutting station on marina dock.
DSCN5045	Potential unpermitted discharge from bathroom sink and floor drain.
DSCN5046	Bathroom adjacent from potential unpermitted discharge point.
DSCN5048	Bathroom adjacent from potential unpermitted discharge point.
DSCN5049	Permitted discharge point from drain on property.
DSCN5050	Fish cutting station on marina dock.
DSCN5051	Large 60 metric ton mobile lift where power washing, oil changes and other maintenance procedures are done.
DSCN5052	Drain on lift pad with PVC pipe.
DSCN5053	Thick black substance inside drain on lift pad.
DSCN5054	Potential unpermitted discharge from drain on lift pad.
DSCN5055	Overview of potential unpermitted discharge from drain on lift pad.
DSCN5056	Dark photo of pipe channels underneath bathroom with potential illicit discharge to bulkhead.
DSCN5057	Dark photo of pipe channels underneath bathroom with potential illicit discharge to bulkhead.
DSCN5058	Dark photo of pipe channels underneath bathroom with potential illicit discharge to bulkhead.
DSCN5059	Photo of pipe channels underneath bathroom with potential illicit discharge to bulkhead. Vertical pipe on right leads from floor drain and connects with vertical sink drain on the left and leads out towards the bulkhead.
DSCN5060	Bathroom adjacent from bulkhead with potential illicit connections.



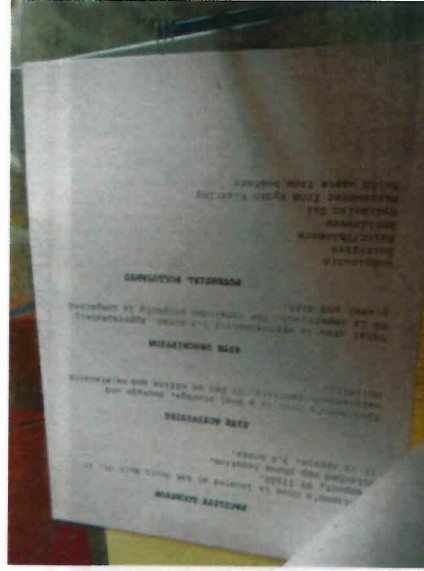
DSCN5033



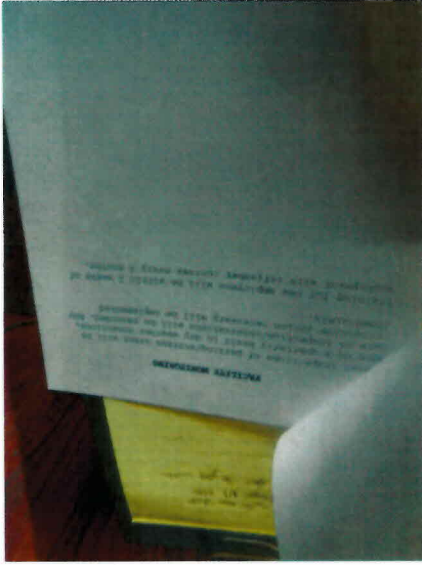
DSCN5034



DSCN5035



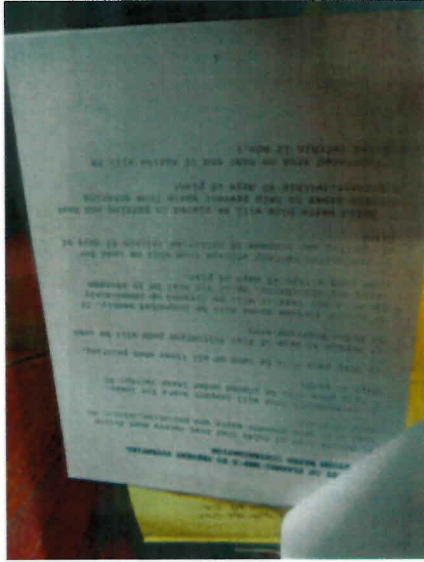
DSCN5036



DSCN5038



DSCN5040



DSCN5037



DSCN5039



DSCN5041



DSCN5042



DSCN5043



DSCN5044



DSCN5045



DSCN5046



DSCN5048



DSCN5049



DSCN5051



DSCN5053



DSCN5050



DSCN5052



DSCN5055



DSCN5054



DSCN5057



DSCN5056



DSCN5059



DSCN5058



DSCN5060

